

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
RAQUEL LAZO  
3 Assistant Federal Public Defender  
Nevada State Bar No. 8540  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Raquel\_Lazo@fd.org

7 Attorney for Louis Fahim Senegal

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LOUIS FAHIM SENEGAL,

15 Defendant.

Case No. 2:19-cr-062-APG-DJA

**STIPULATION TO CONTINUE**  
**RESPONSE DEADLINE TO**  
**GOVERNMENT'S OBJECTION TO**  
**THE REPORT AND**  
**RECOMMENDATION (ECF NO. 52)**  
(Second Request)

16 **ORDER**

17  
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
19 Trutanich, United States Attorney, and Shaheen Torgoley, Assistant United States Attorney,  
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Louis Fahim Senegal, that the  
22 response deadline to the Government's Objection to the Report and Recommendation (ECF No.  
23 52) currently scheduled for Friday, January 24, 2020, be vacated and set to Friday, January 31,  
24 2020.  
25  
26

1 This Stipulation is entered into for the following reasons:

2 1. On December 20, 2019, Magistrate Judge Albregts issued a Report &  
3 Recommendation recommending that Senegal's Motion to Suppress Evidence be granted. ECF  
4 No. 50. On January 3, 2020, the government timely filed its Objections. ECF No. 52.

5 2. Mr. Senegal's response to the government's objections is currently due on  
6 January 24, 2020. The parties had been actively working towards a resolution in this case which  
7 would have obviated the need for continued litigation on the motion to suppress. The parties  
8 have been unable to negotiate the matter.

9 3. The requested continuance will permit Mr. Senegal sufficient time to draft and  
10 file a response to the government's objections.

11 4. The defendant is incarcerated and does not object to the continuance.

12 5. The parties agree to the continuance.

13 6. The additional time requested herein is not sought for purposes of delay, but  
14 merely to allow counsel for defendant sufficient time within which to be able to effectively  
15 prepare a reply.

16 7. Additionally, denial of this request for continuance could result in a miscarriage  
17 of justice.

18 This is the second request to continue the response deadline date filed herein.

19 DATED this 24<sup>th</sup> day of January, 2020.

20  
21 RENE L. VALLADARES  
22 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

23 */s/ Raquel Lazo*  
24 By \_\_\_\_\_

25 RAQUEL LAZO  
Assistant Federal Public Defender

*/s/ Shaheen Torgoley*  
By \_\_\_\_\_

SHAHEEN TORGOLEY  
Assistant United States Attorney

Case No. 2:19-cr-062-APG-DJA

Plaintiff,

V.

LOUIS FAHIM SENEGAL,


Defendant.

ORDER

## ORDER

IT IS THEREFORE ORDERED that defense counsel's response to the Government's Objection to the Report and Recommendation (ECF No. 52) currently due on Friday, January 24, 2020, be vacated and continued to Friday, January 31, 2020.

Dated: January 24, 2020.

  
UNITED STATES DISTRICT JUDGE